

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TONYA CLAY, et al.,

Plaintiffs,

-vs-

CUYAHOGA COUNTY, et al.,

Defendants.

Case No. 1:18 CV 2929

Judge Solomon Oliver, Jr.

JOINT STATUS REPORT CONCERNING SETTLEMENT NEGOTIATIONS PROCESS

Plaintiffs and the Cuyahoga County Defendants (“Parties”) now submit this joint report of the status of the settlement negotiations. Parties have made progress in their discussions and expect that the terms will be finalized before the end of the year.

As noted in the joint report filed on September 30, 2022, parties have continued working on a plan to address the remaining recommendations of the Joint Expert. Though the process has taken a little longer than expected, they now believe that the terms will be finalized within 30 days.

The Parties will update the Court if there are issues or the Parties have reached an impasse on their negotiations. So far, the Parties do not anticipate any problems. Accordingly, the Parties respectfully ask this Court to continue to hold this

case in abeyance, pending the Parties' ongoing efforts toward finalizing the potential resolution.

Respectfully submitted,

/s/Sarah Gelsomino

Jacqueline Greene (0092733)
FRIEDMAN, GILBERT + GERHARDSTEIN
35 East 7th St Ste 201
Cincinnati, Ohio 45202
T: (513) 572-4200
F: (216) 621-0427
jacqueline@FGGfirm.com

Sarah Gelsomino (0084340)
Terry Gilbert (0021948)
FRIEDMAN, GILBERT + GERHARDSTEIN
50 Public Square, Suite 1900
Cleveland, Ohio 44113
T: (216) 241-1430
F: (216) 621-0427
sarah@FGGfirm.com
terry@FGGfirm.com

James L. Hardiman (0031043)
CLEVELAND BRANCH NAACP
3615 Superior Avenue
Cleveland, Ohio 44114
T: (216) 431-7811
F: (216) 431-7644
attyjhard@aol.com

Caroline H. Gentry (0066138)
Ana P. Crawford (0090581)
PORTER WRIGHT MORRIS & ARTHUR LLP
One South Main Street, Suite 1600
Dayton, OH 45402
T: (937) 449-6810
F: (937) 449-6820
cgentry@porterwright.com
acrawford@porterwright.com
Counsel for Plaintiffs

MICHAEL C. O'MALLEY
Prosecuting Attorney of Cuyahoga
County

By: /s/Brendan D. Healy (per consent)
David G. Lambert (0030273)
Brendan D. Healy (0081225)
CUYAHOGA COUNTY PROSECUTOR'S OFFICE
The Justice Center, Courts Tower
1200 Ontario Street, 8th Floor
Cleveland, Ohio 44113
T: (216) 443-7800
F: (216) 698-2270
dlambert@prosecutor.cuyahogacounty.us
bhealy@prosecutor.cuyahogacounty.us

*Counsel for Defendants Cuyahoga
County, Armond Budish, Clifford
Pinkney, Eric J. Ivey, George Taylor,
and Brandy Carney*

CERTIFICATE OF SERVICE

I hereby certify that on November __14____, 2022 a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Sarah Gelsomino
Sarah Gelsomino (0084340)
One of the Attorneys for Plaintiffs